

**Exhibit E**

**Estimated Staffing and Budget Plan**

**STAFFING PLAN FOR SULLIVAN & CROMWELL LLP, COUNSEL TO THE  
DEBTORS AND DEBTORS-IN-POSSESSION,  
FOR THE PERIOD FEBRUARY 1, 2023 THROUGH APRIL 30, 2023**

TIMEKEEPER CATEGORY	NUMBER OF TIMEKEEPERS EXPECTED TO WORK ON THE MATTER DURING THE APPLICATION PERIOD <sup>(1)</sup>	RANGE OF RATES
Partners	55	\$1,850.00-\$2,165.00
Associates	130	\$550.00-\$1,475.00
Non-Legal Personnel	65	\$425.00-\$595.00

(1) Estimate is for total number of timekeepers billing any substantial number of hours to matter (not F.T.E.s).

(2) Includes clerks, legal analysts and eDiscovery professionals.

**ESTIMATED BUDGET FOR SULLIVAN & CROMWELL, COUNSEL  
TO THE DEBTORS AND DEBTORS-IN-POSSESSION,  
FOR THE PERIOD FEBRUARY 1, 2023 THROUGH APRIL 30, 2023**

PROJECT CATEGORY	ESTIMATED HOURS <sup>1</sup>	ESTIMATED FEES <sup>2</sup>	HOURS BILLED	FEES SOUGHT
ASSET ANALYSIS AND RECOVERY	2,850.00	\$3,291,750.00	2,340.50	\$3,482,564.50
ASSET DISPOSITION	6,000.00	\$6,930,000.00	4,633.00	\$6,256,661.50
ASSUMPTION AND REJECTION OF LEASES AND CONTRACTS	450.00	\$519,750.00	83.90	\$85,143.50
AVOIDANCE ACTION ANALYSIS	1,200.00	\$1,386,000.00	3,442.30	\$4,524,023.00
BUSINESS OPERATIONS	750.00	\$866,250.00	485.20	\$587,411.50
CASE ADMINISTRATION	750.00	\$866,250.00	187.00	\$356,947.00
CLAIMS ADMINISTRATION AND OBJECTIONS	15.00	\$17,325.00	176.50	\$211,024.50
CORPORATE GOVERNANCE AND BOARD MATTERS	1,200.00	\$1,386,000.00	421.00	\$607,311.50
EMPLOYEE BENEFITS AND PENSIONS	375.00	\$433,125.00	274.40	\$350,296.00

<sup>1</sup> Estimated hours represent high-end of S&C's estimates of hours during the interim fee period.

<sup>2</sup> Estimated fees represent high-end of S&C's estimates of fees during the interim fee period.

EMPLOYMENT AND FEE APPLICATIONS (S&C)	1,050.00	\$1,212,750.00	290.00	\$345,650.00
EMPLOYMENT AND FEE APPLICATIONS (OTHERS)	600.00	\$693,000.00	218.70	\$293,358.00
FINANCING AND CASH COLLATERAL	60.00	\$69,300.00	5.20	\$8,757.50
OTHER LITIGATION	1,200.00	\$1,386,000.00	788.90	\$1,058,078.50
MEETINGS AND COMMUNICATIONS WITH CREDITORS	900.00	\$1,039,500.00	224.90	\$412,434.50
NON-WORKING TRAVEL	150.00	\$173,250.00	40.90	\$36,583.60
PLAN AND DISCLOSURE STATEMENT	15.00	\$17,325.00	54.50	\$85,606.00
RELIEF FROM STAY AND ADEQUATE PROTECTION	120.00	\$138,600.00	26.60	\$41,757.00
TAX	375.00	\$433,125.00	248.30	\$489,588.50
VALUATION	0.00	\$0.00	-	\$0.00
DISCOVERY	14,250.00	\$16,458,750.00	11,203.70	\$7,970,732.50
HEARINGS	150.00	\$173,250.00	31.40	\$48,890.50
FIRST AND SECOND DAY MOTIONS	900.00	\$1,039,500.00	22.60	\$27,023.00
CLAIMS INVESTIGATION	150.00	\$173,250.00	1.60	\$3,464.00
GENERAL INVESTIGATION	5,400.00	\$6,237,000.00	2,007.50	\$2,830,345.50
SCHEDULES, SOFAS AND REPORTING	45.00	\$51,975.00	204.50	\$307,875.50
OTHER MOTIONS/APPLICATIONS	1,050.00	\$1,212,750.00	516.00	\$750,604.50
TIME ENTRY REVIEW	2,250.00	\$0.00	2,004.30	\$0.00
BUDGETING	30.00	\$34,650.00	5.40	\$6,494.00
GENERAL REGULATORY	1,500.00	\$1,732,500.00	263.80	\$409,674.50
BAHAMAS MATTERS	1,500.00	\$1,732,500.00	893.40	\$1,211,055.50
FOREIGN DEBTOR MATTERS	1,950.00	\$2,252,250.00	1,357.90	\$2,211,213.00
COORDINATION WITH FOREIGN PROCEDURES	450.00	\$519,750.00	41.70	\$80,892.00
COORDINATION IN OTHER BANKRUPTCIES	1,950.00	\$2,252,250.00	730.20	\$1,092,609.00
INVESTIGATIVE REPORTS	60.00	\$69,300.00	812.40	\$1,308,799.50
<b>Total</b>	<b>49,695.00</b>	<b>\$54,798,975.00</b>	<b>34,038.20</b>	<b>\$37,492,869.60</b>